

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAROLYN E. JONES,
Plaintiff

v.

Civil Action No.
04-10133-MEL

WILLIAM A. MASON, CHIEF
OF POLICE, HARWICH POLICE
DEPARTMENT, and the TOWN
OF HARWICH,
Defendants

JOINT SCHEDULING STATEMENT

Pursuant to LR 16.1(D), the parties submit this joint scheduling statement.

NATURE OF THE ACTION

The plaintiff, Carolyn E. Jones, has sued her former employer, the Town of Harwich, and William A. Mason, Chief of the Harwich Police Department, alleging violations M.G.L. c. 151B, M.G.L. c. 111F, M.G.L. c. 12, § 11I (the Massachusetts civil rights act), and 42 U.S.C. §1983.

JOINT DISCOVERY PLAN

Automatic Disclosures

The parties shall provide their initial disclosures, pursuant to Fed.R.Civ.P. 26(a), by April 30, 2004.

Written Discovery

All written discovery (excluding requests for admissions) shall be served by July 30, 2004.

Deposition of Fact Witnesses

All fact depositions will be completed by September 30, 2004.

Expert Witnesses

Plaintiff's expert witnesses shall be identified by September 30, 2004.

Plaintiff's expert reports will be provided by October 14, 2004.

Depositions of expert witnesses shall be completed by November 30, 2004.

PROPOSED MOTION SCHEDULE

All dispositive motions will be served by November 30, 2004 but may be filed at anytime previous thereto.

All discovery motions, to the extent necessary, shall be filed prior to the close of discovery.

SETTLEMENT PROPOSALS

The plaintiff has presented the defendants with a written settlement proposal. Counsel for the defendants is prepared to respond to proposals at the scheduling conference.

LR 16.1(D)(3) CERTIFICATION

The parties hereby certify that each party and that party's counsel have conferred:

- (a) with a view to establishing a budget for the costs of conducting the full course—and various alternative courses—of the litigation; and,
- (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in LR 16.4.

The parties' signed LR 16.1 certifications shall be submitted under separate cover by their attorneys.

Respectfully submitted,
The Town and Harwich and
William A. Mason, Chief of
the Harwich Police
Department,
By their attorneys,

s// Eugene J. Sullivan III

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Eugene J. Sullivan III,
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Dated: March 17, 2004

THE PLAINTIFF,
Carolyn E. Jones,
By her attorney,

s// Brian Rogal
by E.J.S.

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Needham, MA 02494
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Dated: March 17, 2004